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September 27, 2012

**By Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

FILED/ACCEPTED

SEP 27 2012

Federal Communications Commission  
Office of the Secretary

**Re: WC Docket No. 12-233  
WCB/Pricing No. 12-09  
Direct Case of Ridgeway Telephone Company d/b/a TruVista  
Communications**

Dear Ms. Dortch:

John Staurulakis, Inc. hereby files the attached Direct Case on behalf of Ridgeway Telephone Company d/b/a TruVista Communications pursuant to the Commission's *Order Designating Issues for Investigation*, DA 12-1430, released August 31, 2012 in the above-referenced docket. The Direct Case is filed as confidential under the Commission's Protective Order.<sup>1</sup> Pursuant to the Protective Order, provided are one copy of the confidential version and two copies of the redacted version. The redacted version has also been filed on the Electronic Comment Filing System.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

John Kuykendall  
Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

Attachment

cc: Robin Cohn, Pricing Policy Division, via email.

No. of Copies rec'd 0+1  
List ABCDE

<sup>1</sup> See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB/Pricing File No. 12-09, Protective Order, DA 12-1518, rel. Sept. 21, 2012.

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

SEP 27 2012

Federal Communications Commission  
 Office of the Secretary

In the Matter of	)	
	)	WC Docket No. 12-233
Investigation of Certain 2012 Annual	)	
Access Tariffs	)	WCB/Pricing No. 12-09
	)	

**DIRECT CASE OF  
 RIDGEWAY TELEPHONE COMPANY  
 D/B/A TRUVISTA COMMUNICATIONS**

Ridgeway Telephone Company d/b/a TruVista Communications, (“Ridgeway”) pursuant to the August 31, 2012 Designation Order,<sup>1</sup> hereby files its Direct Case in the above-referenced matter.

**I. INTRODUCTION**

On June 18, 2012, Ridgeway Telephone Company d/b/a TruVista Communications, (alternatively “Ridgeway” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) filed under Transmittal No. 165 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”) revisions in accordance with the Commission’s March 28, 2012 release entitled In the Matter of July 3, 2012 Annual Access Charge Tariff Filings, WCB/Pricing File No. 12-07, Order, DA 12-482 (“June 18<sup>th</sup> filing”). Ridgeway is an Issuing Carrier of the JSI Tariff.

Ridgeway elected to file an Access Recovery Charge (“ARC”) pursuant to Section 51.917(e), to be effective July 3, 2012, and a Connect America Fund (“CAF”) election pursuant to Section 51.917(f). The Company made the appropriate filing on June 18, 2012. On July 2, 2012, the Wireline Competition Bureau released an Order that

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<sup>1</sup> Investigation of Certain 2012 Annual Access Tariffs, WC Docket No. 12-233, WCB/Pricing No. 12-09, *Order Designating Issues for Investigation*, DA 12-1430 (rel. August 31, 2012) (“Designation Order”).

suspended for one day and set for investigation the ARC rates contained in the 2012 Annual Access Tariff filings of all issuing incumbent local exchange carriers (“ILECs”) that charged an ARC, including those filed on behalf of Ridgeway. Pursuant to the *Designation Order*, Ridgeway hereby submits the required information and demonstrates that in light of the adjustments discussed in this Direct Case, Ridgeway’s ARC rates are just and reasonable.

The financial information presented in this Direct Case as Exhibit 1, the 2012 ROR ILEC Interstate Rates Worksheet and the 2012 ROR ILEC Intrastate Rates Worksheet,<sup>2</sup> is confidential and is being submitted with this Direct Case in both confidential and redacted versions. In light of the fact that Ridgeway is not re-filing any financial information in conjunction with this Direct Case, and that it has not filed an amendment to the Tariff Review Plans filed on behalf of Ridgeway as part of the June 18<sup>th</sup> filing, Ridgeway will not be filing new certifications with this Direct Case

## **II. ISSUES DESIGNATED FOR INVESTIGATION**

### **A. Whether LEC has Reasonably Determined the Amount of its Base Period Revenue**

#### **1. Fiscal Year 2011 Revenue Determinations**

A rate-of-return Local Exchange Carrier’s (“LEC’s”) Base Period revenue is made up of three components: 1) its 2011 Interstate Switched Access Revenue Requirement; 2) Fiscal Year 2011 revenues from rate elements included in the definition of Transitional Intrastate Access Service received by March 31, 2012; and 3) Fiscal Year 2011 reciprocal compensation revenues received by March 31, 2012, less Fiscal Year

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<sup>2</sup> Also referred to as the Tariff Review Plan or financial information.

2011 reciprocal compensation payments made by March 31, 2012 (net reciprocal compensation revenues). Base Period Revenue also includes revenues from non-recurring charges associated with the switched access services in question.

Ridgeway bills its carrier access bills (“CABs”) on a calendar month cycle. Consequently, intrastate terminating billing usage reflected in the June 18<sup>th</sup> filing for Ridgeway was based on the time period from October 1, 2010 through September 30, 2011, which is the Fiscal Year put forth by the Commission. The CABs are used to ensure that the revenues are for services provided during Fiscal Year 2011, eliminate billed revenues not related to services provided such as late fees which are identified separately on the CABs and to make certain that billed revenues were collected by March 31, 2012. Accordingly, no adjustment to the intrastate terminating billing usage is required at this time.

**2. Non-recurring charges inclusions and eliminations**

Ridgeway does not have any non-recurring charges associated with the services in question. As a result, Base Period Revenue is not impacted by non-recurring charges. Non-recurring charges not related to these services were also excluded from the billed revenues used in the June 18<sup>th</sup> filing and in this Direct Case.

**B. Whether LEC has Reasonably Calculated its Required Intrastate Rate Reductions**

Ridgeway has followed the appropriate procedure when determining its required intrastate rate reductions for the purposes of the June 18<sup>th</sup> filing, and for this Direct Case,

and is not subject to review of this issue as outlined in the Commission's *Designation Order*.

**C. Whether LEC has Reasonably Estimated its Projected Interstate and Intrastate Switched Access Demand**

LECs were directed to use existing demand estimation methods to project demand for the 2012-2013 tariff period. In calculating the Eligible Recovery, a LEC must also subtract certain projected intrastate and interstate access revenues from its Base Period.

Please reference Exhibit 1. As indicated on the 2012 ROR ILEC Interstate Rates Worksheet, the LSS amount reflected in cell F-7 is [REDACTED] and the projected annual percentage rate of demand change reflected in the calculation of the amount in cell F-10 is -1.73 percent. As indicated on the 2012 ROR ILEC Intrastate Rates Worksheet, the projected annual percentage rate of demand change reflected in the calculation of the amount in cell G-9 is -5.04 percent. This review indicates that Ridgeway's projected interstate and/or intrastate demand loss is less than an annualized rate of fifteen percent. Accordingly, Ridgeway falls within the "safe harbor" of fifteen percent and no further action is warranted.

**D. Whether NECA's Allocation of Projected Pool Interstate Switched Access Revenues Based on Projected Switched Access Billed Revenues was Reasonable**

Not applicable to Ridgeway Telephone Company d/b/a TruVista Communications.

**E. Whether the Suspended Access Recovery Charge Rates are Just and Reasonable and, if not, the Process for Requiring Refunds**

Please reference Exhibit 2 which is a Table reflecting Ridgeway's filed ARC rates and the ARC rates supported by this Direct Case. In this Direct Case, Ridgeway reaffirms the ARC rates that were established in the June 18<sup>th</sup> filing and asserts that the ARC rates established in the June 18<sup>th</sup> filing were just and reasonable. Ridgeway is also filing Exhibit 3 with this Direct Case, which is the completed Tariff Review Plan showing the calculation of its ARC rates. In light of the fact that no changes are being proposed to the ARC rates calculations, this Tariff Review Plan will not be re-filed and Ridgeway will not be filing revised ARC rates with the Commission in conjunction with this Direct Case.

### III. CONCLUSION

Ridgeway presents this Direct Case in compliance with the aforementioned August 31, 2012 Designation Order. Ridgeway has reasonably determined the amount of its Base Period Revenue, reasonably calculated its required intrastate rate reductions, and reasonably estimated its projected interstate and intrastate switched access demand.

Accordingly, and in light of the adjustments described in this Direct Case, Ridgeway's suspended ARC rates are just and reasonable and are reaffirmed by this Direct Case.

Respectfully submitted,

September 27, 2012

**Ridgeway Telephone Company  
d/b/a TruVista Communications**

/s/ Thomas T. Harper

Thomas T. Harper  
Vice President-Administration & Regulatory  
Affairs  
112 York Street  
P.O. Box 160  
Chester, South Carolina 29706

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## EXHIBIT 1

- 2012 ROR ILEC Interstate Rates Worksheet
- 2012 ROR ILEC Intrastate Rates Worksheet

Filing Date:	18-Jun-12
Filing Entity:	TruVista Communications Inc. d/b/a Ridgeway Telephone Company
Transmittal Number:	165
COSA:	240541

Most Recently Filed Interstate Switched Access Revenue Requirement	Input	
TY 2012-2013 Baseline Adjustment Factor (BAF)		0.95
BAF X Most Recently Filed Interstate Switched Access Revenue Requirement	F7*F8	
Total TY 2012-2013 Expected Maximum Interstate Revenue	Sum of Col. H	
TY 2012-2013 Interstate Eligible Recovery	F9-F10	

Interstate Tariff Section	USOC	Interstate Switched Access Rate Element	Unit of Demand (e.g., MOU or DS1)	12/29/11 Interstate Rate	7/1/2012 Proposed Rate
Input	Input	Input (Note 1)	Input	Input	Input
		<b>** LOCAL SWITCHING **</b>			
17.2.3 (A)		Local Switching Premium	MOU	0.00989	
		<b>** INFORMATION **</b>			
17.2.3 (B)		Information Surcharge Premium	MOU	0.0185	
		<b>** TANDEM-SWITCHED TRANSPORT AND TANDEM **</b>			
17.2.2		Tandem Switched Facility	MOU per Mile		0.000159
17.2.2		Tandem Switched Termination	MOU per Term		0.000828
17.2.2		Tandem Switching	MOU per Tand		0.001727
		<b>** SIGNALING FOR TANDEM SWITCHING **</b>			
		<b>** DIRECT-TRUNKED TRANSPORT **</b>			
17.2.2		Direct Trunked Facility	DS1 per Mile		9.2
17.2.2		Direct Trunked Termination	DS1 per Term		47.72
		<b>** DEDICATED SIGNALING TRANSPORT **</b>			
17.2.2 (A)(2)		STP Port	per Port		244
		<b>** ENTRANCE FACILITIES **</b>			
17.2.2		Entrance Facility	DS1 per Term		134.25
		<b>** LINE INFORMATION DATABASE **</b>			
17.2.2		800 Series Data Base Access Service - Basic	per Query	0.0029	0.0029
17.2.2		800 Series Data Base Access Service - Vertical Feature	per Query	0.0032	0.0032
		<b>** BILLING NAME AND ADDRESS **</b>			

Total TY 2012-2013 Expected Maximum Interstate Revenue (Sum of Col. H)

Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary

Filing Date.	18-Jun-12
Filing Entity.	TruVista Communications inc d/b/a Ridgeway Telephone Company
Transmittal Number	165
COSA	240541

Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements	Sum of Col O
95% of Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements	Sum of Col P
Total TY 2012-2013 Expected Maximum Transitional Intrastate Access Service Revenue	Sum of Col R
Total TY 2012-2013 Intrastate Eligible Recovery	Sum of Col S

[illegible]

**Note 1** Enter one rate element per line under the relevant category. Insert rows as necessary.

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## EXHIBIT 2

Initial ARC Rate and Direct Case ARC Rate

Comparison Table

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**RIDGEWAY TELEPHONE COMPANY  
D/B/A TRUVISTA COMMUNICATIONS**

**Exhibit 2**

**Initial ARC Rate and Direct Case ARC Rate Comparison Table**

	<b>Initial ARC Rate</b>	<b>Direct Case ARC Rate</b>
<b>Primary Residential or Single Line Business End User Common Line Charge</b>	<b>\$0.50</b>	<b>\$0.50</b>
<b>Multi-Line Business End User Common Line Charge</b>	<b>\$1.00</b>	<b>\$1.00</b>

**Excludes Lifeline Customers**

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## EXHIBIT 3

Tariff Review Plan

Calculation of ARC Rates

**Filing Date (enter w/leading '):**  
**Holding Company:**  
**Filing Name:**

TruVista Communications Inc. d/b/a Ridgeway Telephone Company  
Ridgeway Telephone Company

Study Area	EXCHANGES
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Rate Ceiling Component Charges Calculation ( 51 915(b)(11) )										MULTI-LINE BUSINESS	
RESIDENCE / NP / BRI / SLB (excluding Lifetime)											
Mandatory						Total Rate					
Stand-alone	Mandatory	Zone	State			State	Federal	Ceiling		Federal	
R1 rate	EAS	Charges	SLC	E911	TRS	USF	SLC	Comp. Chgs		SLC-MLB	
\$ 13.95	\$ -	\$ -	\$ 0.35	\$1.00	\$0.15	\$0.00	\$6.50	\$21.95		\$ 9.20	

REDACTED VERSION FOR PUBLIC REVIEW

Filing Date (enter w/leading '): 6/18/2012  
Holding Company: TruVista Communications Inc d/b/a Ridgeway Telephone Company  
Filing Name: Ridgeway Telephone Company

ARCCTRP-CAF-2

Eligible Revenue - Current Yr Recovery

Maximum Imputed ARC Revenue

Tariffed ARC Revenue

Expected CAF ICC Support

\$ 213,112

Eligible Revenue - Current Yr Recovery

Tariffed ARC Revenue + Expected CAF ICC Support

Residential Rate Ceiling ( 51 915(b)(12) )

\$ 30 00

Maximum MLB SLC+ARC ( 51 915(e)(5)(iv) )

\$ 12 20

Max ARC for current year Res/SLB

\$ 0 50

Max ARC for current year MLB

\$ 1 00

Totals

Exchange/RG

RESIDENCE / NP / BRI / SLB (excluding Lifeline)

MULTI-LINE BUSINESS

	Residential Total Rate Ceiling Chgs	RES/NP/BRI Current Year Maximum ARC Rate	Tariffed ARC Rate	SLB Tariffed ARC Rate		MLB Federal SLC	MLB Curr Yr Maximum ARC Rate	NonCentrex Tariffed ARC Rate	Centrex Tariffed ARC Rate	
Ridgeway	\$ 21 95	\$ 0 50	\$ 0 50	\$ 0 50		\$ 9 20	\$ 1 00	\$ 1 00	\$ 1 00	